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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

**Amendment of Part 95 of the
Commission's Rules to allow
Interactive Video and Data
Service licensees to provide
mobile service to subscribers.**

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**WT Docket No. 95-47
RM-8476**

To: The Commission - Mail Stop 1170

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REPLY COMMENTS OF RADIO TELECOM & TECHNOLOGY INC.

1. Radio Telecom & Technology Inc. ("RTT") hereby submits these reply comments in the above-captioned proceeding. RTT is an IVDS equipment manufacturer, holding contracts or letters of intent to supply IVDS equipment to over 125 markets. It filed initial comments on June 26 and an *Erratum* on June 30, 1995

2. It is apparent from the review of the initial comments that each equipment manufacturer seeks to preserve access to the IVDS market for its own product design. It is also apparent that many, if not most, IVDS licensees are not certain what they want to do with their systems, want the Commission to let them do anything they choose, and in many cases bid for their licenses without enough money to build and operate their systems and are having difficulty finding financing. The Commission could do a juggling act, trying to please everyone, or it could simply abandon the existing structure of the service and let

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anyone do anything. It should do neither. The Commission's obligation is to the public, and there are two important points on which the Commission should focus in fulfilling that obligation. One is the avoidance of interference, both to the reception of broadcast television signals and between IVDS systems^{1/}. The second is to encourage the development of new and innovative communications services.^{2/}

3. Applying those principles, the Commission may decide to allow mobile IVDS operation; but until more is known about the behavior, and thus the interference potential, of IVDS equipment in practice, the service must be maintained as primarily a fixed service, with mobile service provided on only an ancillary basis. To ensure that mobile services do not take over the band, the Commission must either restrict mobile services to fixed subscribers or limit the amount of mobile traffic that a system may carry. Since the latter approach would be difficult to enforce, RTT believes that at least at the start, the Commission should adhere to its proposal to allow mobile services to be offered only to fixed IVDS subscribers.

4. It is particularly important that IVDS not be permitted to degenerate into another commercial mobile radio service ("CMRS"). None of the commenters desires to subject itself to CMRS regulation, but most seek to escape such regulation by avoiding interconnection to the public switched telephone network ("PSTN"). The Commission should

^{1/} In light of the fact that several equipment manufacturers have entered the IVDS market, using significantly different technologies, interference issues between IVDS systems is likely to require the serious attention of system designers.

^{2/} Beyond those two principles, regulatory intrusion should be kept to a minimum.

focus first on promoting innovation, which in this case means encouraging IVDS to be an interactive adjunct to video program distribution before it is allowed to become a data distribution or paging service.^{3/} In particular, one-way point-to-multipoint data distribution should be discouraged.^{4/} It is also appropriate to preclude IVDS RTU's from direct access to the PSTN, in order to avoid CMRS regulation; but the Commission must be careful not to preclude or to regulate interconnection of CTS's to the PSTN, or to regulate IVDS as a CMRS on account of CTS interconnection, as the networking of CTS's through the PSTN is an important part of RTT's plans for its customers and will be an critical to allow IVDS users to interact with centralized databases.^{5/}

5. Finally, RTT feels it is important to underscore the point made in its initial comments that now is not the time to change the maximum power limit for fixed RTU's, as equipment is coming off the pipeline based on the rules as originally adopted. A limit of power of 20 watts average ERP will permit the deployment of wide-area IVDS systems with

^{3/} It is interesting to RTT that the broadcast community has not made its voice heard in this proceeding, both with respect to the benefits of interactive video services as an adjunct to television broadcasting and the issue of interference to television reception.

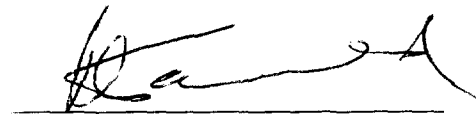
^{4/} This is not to say that all IVDS traffic must be two-way. One-way traffic from subscribers back to a central point ("multipoint-to-point") is a suitable and innovative use of IVDS. There are many other more efficient and economical ways to distribute large amounts of information outbound from a central source, including FM subcarriers and TV subcarriers and the TV vertical blanking interval. The use of these alternatives can keep IVDS spectrum free for the all-important wireless return link, which has no alternative path.

^{5/} In other words, an IVDS subscriber should be able to interact with databases reached by wireless link to a CTS and wireline interconnection of the CTS (via the PSTN or the Internet) with a host computer without incurring CMRS regulation. The subscriber in that case would not have direct control over the PSTN access and could not direct traffic to the PSTN destination of his or her choice.

no interference to television reception and will avoid forcing IVDS licensees to adopt costly multi-CTS cellular system designs.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'Peter Tannenwald', written over a horizontal line.

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July 11, 1995

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CERTIFICATE OF SERVICE

I, Laura Ann Campbell, do hereby certify that I have, this 11th day of July, 1995, caused to be sent by first class United States mail copies of the foregoing "Reply Comments of Radio Telecom & Technology, Inc." to the following:

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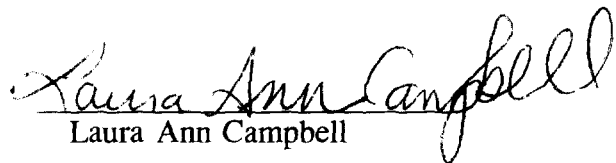
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